

FRANK E. MERIDETH, JR. (46266)
GREENBERG TRAURIG, LLP
2450 Colorado Avenue, Suite 400E
Santa Monica, California 90404
Tel: (310) 586-7825 Fax: (310) 586--275
meridethf@gtlaw.com

Attorneys for Defendants THE FIRST
AMERICAN CORPORATION,
FIRST AMERICAN TITLE INSURANCE
COMPANY, and UNITED GENERAL
TITLE INSURANCE COMPANY
(acting on behalf of the Defendants
listed below for purposes of this stipulation)

DONALD AMAMGBO, (164176)
7901 OAKPORT, SUITE 4900
OAKLAND, CA 94621
Tel: (510) 615-6000 Fax: (510) 615-6025
Donald@Amamgbolaw.com

REGINALD TERRELL
THE TERRELL LAW GROUP
223 25TH STREET
RICHMOND 94804
Tel: (510) 237-9700 Fax: (510) 237-4616

Attorneys for Plaintiff Lisa Blackwell

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

LISA BLACKWELL, on Behalf of
herself and All Others Similarly
Situating,

Plaintiff,

vs.

FIDELITY NATIONAL
FINANCIAL, INC., *et al.*,

Defendants.

CASE NO. CV 08-01928 MEJ

Assigned Judge: Hon. Maria-Elena James

**STIPULATION AND ~~PROPOSED~~
ORDER RE TIME TO RESPOND TO
COMPLAINT**

1 WHEREAS, on April 11, 2008, Plaintiff filed a Complaint seeking recovery under
2 the Sherman Act, Cal. Bus. and Prof. Code §§ 16720, *et seq.*, Cal. Bus. and Prof. Code
3 §§ 17200, *et seq.*, and alleging unjust enrichment;

4 WHEREAS, on April 11, 2008, this Court issued an Order setting forth various
5 deadlines regarding initial case management conference and ADR deadlines (the "Initial
6 Scheduling Order"); and

7 WHEREAS, not all of the Defendants have yet retained local counsel admitted in
8 the Northern District of California, but have authorized counsel for Defendant First
9 American Corporation to file this Stipulation;

10 WHEREAS, this action is one of sixty-four (64) actions recently filed in district
11 courts across the country that are the subject of a pending Motion for Transfer of Actions
12 Pursuant to 28 U.S.C. § 1407 for Coordinated or Consolidated Pretrial Proceedings filed
13 with the Judicial Panel on Multidistrict Litigation ("J.P.M.L.") in *In re Title Insurance*
14 *RESPA and Antitrust Litigation* (the "MDL Motion"), and that motion is scheduled for
15 argument before the J.P.M.L. on May 29, 2008; and

16 WHEREAS, Defendants believe that judicial economy and efficiency will be
17 promoted by extending the existing deadlines in this case pending a determination of the
18 MDL Motion, and therefore, have requested an extension of time of 45 days after the
19 ruling by the J.P.M.L. on the MDL Motion within which to move against, answer or
20 otherwise respond to the Complaint, and have requested to adjourn the deadlines set forth
21 in the Court's Initial Scheduling Order; and

22 WHEREAS, Plaintiff's counsel has agreed to these requests;

23 NOW THEREFORE, the undersigned parties through their respective counsel
24 stipulate and respectfully request on behalf of all Defendants that the Court order as
25 follows:

26 1. The attorneys for the following Defendants hereby accept service of the
27 Complaint on behalf of those Defendants.
28

1 Greenberg Traurig, LLP: The First American Corporation, First American Title
2 Insurance Company, and United General Title Insurance Company.

3 Simpson Thacher & Bartlett, LLP: Fidelity National Title Insurance Company,
4 Fidelity National Financial, Inc., Chicago Title Insurance Company, Ticor Title
5 Insurance Company, Ticor Title Insurance Company of Florida, and Security Union Title
6 Insurance Company.

7 Fulbright & Jaworski, LLP and Sidley Austin, LLP: Stewart Title Guaranty
8 Company and Stewart Title Insurance Company.

9 Severson & Werson and Sutherland Asbill & Brennan, LLP: Landamerica
10 Financial Group, Inc., Commonwealth Land Title Insurance Company, Lawyers Title
11 Insurance Corporation, and Transnation Title Insurance Company.

12 Dewey & Leboeuf, LLP: National Title Insurance of New York, Inc.

13 2. The time for all Defendants listed in Paragraph 1 above to move against,
14 answer or otherwise respond to the Complaint shall be extended until 45 days following
15 the determination of the pending MDL Motion by the J.P.M.L.

16 3. The June 26, 2008 deadline set forth in this Court's Initial Scheduling Order
17 for the Rule 26(f) conference and ADR process selection, shall be extended until 30 days
18 following the determination by the J.P.M.L. of the pending MDL Motion, with
19 corresponding extensions of the additional deadlines set forth in the Initial Scheduling
20 Order.

21 Defendants reserve their rights to move for a stay of all proceedings in this action
22 until the J.P.M.L. determines the pending MDL Motion, or to request further extensions
23 of this deadline, and Plaintiff reserves her rights to oppose such motion or request.

24 Nothing in this stipulation shall be construed as a waiver of any party's right to
25 seek or oppose transfer of this action or coordination or consolidation of this action with
26 any other action.

1 This stipulation may be executed in counterparts, including by signature
2 transmitted by facsimile.

3
4 Dated: May 22, 2008

Respectfully Submitted,

GREENBERG TRAURIG, LLP

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6 By


FRANK E. MERIDETH, JR.

7 Attorneys for Defendants THE FIRST
8 AMERICAN CORPORATION, FIRST
9 AMERICAN TITLE INSURANCE COMPANY,
10 and UNITED GENERAL TITLE INSURANCE
11 COMPANY (acting on behalf of the Defendants
12 listed below for purposes of this stipulation)

13 *Of Counsel:*

14 GREENBERG TRAURIG, LLP

15 James I. Serota

16 Kenneth Lapatine

17 Stephen L. Saxl

18 200 Park Avenue

19 New York, New York 10166

20 Telephone: (212) 801-9200

21 Facsimile: (212) 801-6400

22 serotaj@gtlaw.com

23 lapatine@gtlaw.com

24 saxls@gtlaw.com

25 Attorneys for Defendants THE FIRST
26 AMERICAN CORPORATION, FIRST
27 AMERICAN TITLE INSURANCE COMPANY,
28 and UNITED GENERAL TITLE INSURANCE
COMPANY

SIMPSON THACHER & BARTLETT, LLP

Barry R. Ostrager

Kevin J. Arquit

Patrick T. Shilling

425 Lexington Avenue

New York, New York 10017-3954

Telephone: (212) 455-2000

Facsimile: (212) 455-2502

bostrager@stblaw.com

karquit@stblaw.com

pshilling@stblaw.com

Attorneys for Defendants FIDELITY NATIONAL
FINANCIAL, INC., FIDELITY NATIONAL
TITLE INSURANCE COMPANY, TICOR
TITLE INSURANCE COMPANY, TICOR
TITLE INSURANCE COMPANY OF FLORIDA,
CHICAGO TITLE INSURANCE COMPANY,
and SECURITY UNION TITLE INSURANCE
COMPANY

FULBRIGHT & JAWORSKI, LLP

Mark A. Robertson

David Foster

George Gasper

666 Fifth Avenue

New York, New York 10103

Telephone: 212-318-3304

Facsimile: 212-318-3400

mrobertson@fulbright.com

dfoster@fulbright.com

ggasper@fulbright.com

- and -

1 SIDLEY AUSTIN, LLP
2 Samuel R. Miller
3 555 California St.
4 San Francisco, CA 94104
5 Telephone: (415) 772-7447
6 Facsimile: (415) 772-7400
7 srmiller@sidley.com

8 Attorneys for Defendants
9 STEWART TITLE GUARANTY COMPANY
10 and STEWART TITLE INSURANCE
11 COMPANY

12 SEVERSON & WERSON
13 Mark Joseph Kenney (SBN 87345)
14 One Embarcadero Center, Ste. 2600
15 San Francisco, CA 94111
16 Telephone: (415) 677-5505
17 Facsimile: (415) 956-0439
18 mjk@severson.com

19 Attorneys for Defendants LANDAMERICA
20 FINANCIAL GROUP, INC.,
21 COMMONWEALTH LAND TITLE
22 INSURANCE COMPANY, LAWYERS TITLE
23 INSURANCE CORPORATION, and
24 TRANSNATION TITLE INSURANCE
25 COMPANY

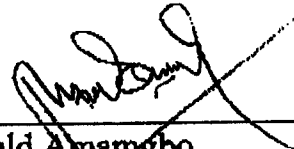
26 *Of Counsel:*
27 SUTHERLAND ASBILL & BRENNAN, LLP
28 Phillip Stano
1275 Pennsylvania Avenue, NW
Washington, D.C. 20004-2415
Telephone: (202) 383-0261
Facsimile: (202) 637-3539
Philip.stano@sablaw.com

1 Attorneys for Defendants LANDAMERICA
2 FINANCIAL GROUP, INC.,
3 COMMONWEALTH LAND TITLE
4 INSURANCE COMPANY, LAWYERS TITLE
5 INSURANCE CORPORATION, and
6 TRANSNATION TITLE INSURANCE
7 COMPANY

8 DEWEY & LEBOEUF, LLP
9 Margaret A. Keane
10 One Embarcadero Center, Suite 400
11 San Francisco, CA 94111
12 Telephone: (415) 951-1100
13 Facsimile: (415) 951-1180
14 mkeane@dl.com

15 Attorneys for Defendant NATIONAL TITLE
16 INSURANCE OF NEW YORK, INC

17 Dated: May 22nd, 2008

18 By: 
19 Donald Amangbo
20 123 Oakport, Suite 4900
21 Oakland, CA 94621
22 Telephone: (510) 615-6000
23 Facsimile: (510) 615-6025

24 THE TERRELL LAW GROUP
25 Reginald Terrell
26 223 25th Street
27 Richmond 94804
28 Telephone: (510) 237-9700
Facsimile: (510) 237-4616

Attorneys for Plaintiff Lisa Blackwell

1 The CMC is continued to September 25, 2008 at 10:00 a.m.

2 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

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4 DATED: 5/23/2008

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6 HON. MARIA F. JAMES
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